

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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CSI WORLDWIDE, LLC,	:	CIVIL ACTION
Plaintiff,	:	
	:	NO. 18-cv-05900
v.	:	
	:	Hon. Virginia M. Kendall
TRUMPF, INC.,	:	
Defendant.	:	

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**SECOND MOTION TO STRIKE AND EXTEND  
DISPOSITIVE MOTION DEADLINE AND BRIEFING SCHEDULE**

Defendant, TRUMPF, Inc., by and through counsel, moves this Court, for a second time, to strike and extend the dispositive motion deadline, and in support, states as follows:

1. On February 23, 2023, Defendant TRUMPF, Inc. (“TRUMPF”) filed a Motion to Compel (1) Plaintiff to Produce all Documents Relating to the Lynch Bankruptcy Proceedings; (2) the Continued Depositions of Thomas McLaughlin and David Centrowitz; and (3) the Depositions of Attorney John Rendemonti and Attorney Arthur J. Abramowitz (“Motion to Compel”). (Dkt. #84)

2. On February 24, 2023, TRUMPF’s Motion to Compel was referred to Magistrate Judge Jeffrey Cummings. (Dkt. #89)

3. In light of the Motion to Compel, Defendant filed its Unopposed First Motion to Strike Dispositive Motion deadline (Dkt. #96), and this Court granted Defendant’s Unopposed Motion, striking the dispositive motion deadline. (Dkt. #97).

4. This Court then set a new dispositive motion deadline of September 29, 2023, and ordered a briefing schedule taking into account the Motion to Compel and any time necessary to complete discovery should the Motion to Compel be granted, with any Response to dispositive motion due by October 27, 2023, and Reply due by November 3, 2023. (Dkt. #99)

5. On September 8, 2023, Judge Cummings provided his Opinion and Order on Defendant TRUMPF's Motion to Compel, denying TRUMPF's Motion.

6. Defendant TRUMPF has timely filed its Rule 72(a) Objections to the September 8, 2023 Memorandum Opinion and Order Denying TRUMPF's Motion to Compel, and have noticed its presentment for September 27, 2023. (Dkt. #104 and #105).

7. This Court's decision on Defendant TRUMPF's Motion to Compel, in the context of Defendant's Rule 72(a) Objections, will likely have a significant effect on the facts underlying this litigation, and has left Defendant TRUMPF with insufficient time to determine the merits of a dispositive motion and prepare such a pleading.

8. Given the discovery TRUMPF still seeks related to its Motion to Compel and Rule 72(a) Objections, TRUMPF requests the current dispositive motion deadline of September 29, 2023 be stricken, and to set a new dispositive motion deadline and briefing schedule that accounts for this Court's Rule 72(a) decision, and for any additional discovery granted to TRUMPF arising out of its Motion to Compel, if permitted.

9. No party will be prejudiced by the granting of this Motion. The denial of this Motion will result in prejudice to Defendant TRUMPF.

10. After conferring with Plaintiff's counsel, Plaintiff, CSI Worldwide, LLC does not consent or join this Motion.

WHEREFORE, Defendant, TRUMPF, Inc. respectfully request this Court enter an order:

- A. Striking the September 29, 2023 dispositive motion deadline and dispositive motion briefing schedule;
- B. Extending the dispositive motion deadline and briefing schedule to a date certain to be determined following the resolution of Defendant TRUMPF's Presentment of Rule

72(a) Objections and following any additional discovery afforded to TRUMPF arising out of its February 23, 2023 Motion to Compel; and

C. For such other relief as the Court deems just and proper.

Respectfully submitted,

Date: September 22, 2023

/s/ Todd M. Saranecki

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*Counsel for TRUMPF, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22<sup>ND</sup> day of September, 2023, a true and correct copy of the parties' *Second Motion to Strike and Extend Dispositive Motion Deadline and Briefing Schedule* was filed electronically using the Court's ECF filing system. This document is available for viewing and downloading from the ECF system and electronic notification has been sent to all counsel of record.

/s/ Todd M. Saranecki